

EXHIBIT J

EMAIL TO DEFENDANTS COUNSEL WITH RACKSPACE INSTRUCTIONS

From: Darrell Phillips
Sent: Friday, July 31, 2015 10:57 AM
To: richard@bbfpc.com
Subject: Rackspace

Richard:

I just had a very lengthy and helpful conversation with Steve Priola at Rackspace. They do not want to comply with the subpoena and he has suggested (what I think is) a very reasonable solution that will keep costs down and avoid sanctions against your client and a fight with Rackspace.

Simply put, here is the proposal: Mr. Watts, today, personally requests the export of each of the mailboxes we described and asks Rackspace to notify me and you when the files are ready. Rackspace will provide both of us credentials to download the file. We will download, but not review the file. You can download and filter the file for privileged info and then provide the materials minus the privileged stuff. The downside is that we will not get a records custodian affidavit from Rackspace. The upside is that neither of us will bear any costs and I think we can get this moving fairly quickly.

If this works, please ask Mr. Watts to do the following as soon as possible:

1. Open one or multiple support tickets with Rackspace.com requesting the export of the entirety of the following mailboxes: usisr.com, indicopublic.com, sami@usisr.com, clealiii@usisr.com, isrdcw@usisr.com, and clealiii@indicopublic.com
2. When prompted for a notification email address, Mr. Watts should provide: dphillips@pcplc.com and Richard@bbfpc.com.
3. Rackspace will generate a download link (with password credentials) and will email both of us in a week or two.
4. We will preserve but not access our download. You will access, review and redact for privilege where necessary and then provide the materials to us with a privilege log.

I think this is a reasonable solution to avoid having to go back before the Court either to compel your client to do this and without having to give Rackspace a dog in the hunt by seeking to enforce the subpoena.

Once you have discussed with your client, please let me know asap if this is agreeable and that he will get it done asap.

Thanks much.

Darrell N. Phillips
Telephone: 901.685.2662
Facsimile: 901.685.6122
Web: <http://www.pcplc.com>
E-mail: dphillips@pcplc.com



Pietrangelo Cook PLC
International Place ◊ Tower II

6410 Poplar Avenue, Suite 190
Memphis, Tennessee 38119

This electronic message contains information that is intended only for the recipient named and may be confidential and subject to the attorney-client or work product privilege, and any such applicable privilege is expressly not waived by this communication. If you are not the intended recipient or a person responsible for delivering this communication to the intended recipient, you are hereby notified that you have received this communication in error, and that any review, dissemination, disclosure, distribution, copying or the taking of any action in reliance upon the contents of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately via return e-mail or telephone at the number listed above and delete this communication and destroy any copies.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the Internal Revenue Service and the United States Treasury Regulations, we inform you that if any advice concerning one or more U.S. federal tax issues is contained in this communication (including any attachments), such advice is not intended or written by the sender to be used, and cannot be used, by any recipient for the purpose of (1) avoiding penalties under the Internal Revenue Code or other United States federal tax laws, or (2) promoting, marketing or recommending to another party any transaction or tax-related matter addressed herein.

E-Sign / Uniform Electronic Transactions Act Disclosure: Nothing contained in this communication is intended to constitute an electronic signature as provided in the Electronic Signatures in Global and National Commerce Act ("E-Sign") or the Uniform Electronic Transactions Act unless a specific statement of the intent to be so used is included in the communication.